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Attorneys for the United States

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

APPROXIMATELY \$42,687.68 SEIZED
FROM WELLS FARGO BANK
ACCOUNT NUMBER 320-3742212,

APPROXIMATELY \$1,840.42 SEIZED
FROM WELLS FARGO BANK
ACCOUNT NUMBER 517-7263489,

APPROXIMATELY \$629.84 SEIZED
FROM WELLS FARGO BANK
ACCOUNT NUMBER 532-7107099,

APPROXIMATELY \$143.04 SEIZED
FROM WELLS FARGO BANK
ACCOUNT NUMBER 530-4807349,

APPROXIMATELY \$50.08 SEIZED
FROM WELLS FARGO BANK
ACCOUNT NUMBER 333-4403940, AND

APPROXIMATELY \$16,566.00 IN
U.S. CURRENCY,

Defendants.

2:20-MC-00301-WBS-CKD

STIPULATION AND ORDER EXTENDING TIME
FOR FILING A COMPLAINT FOR FORFEITURE
AND/OR TO OBTAIN AN INDICTMENT
ALLEGING FORFEITURE

It is hereby stipulated by and between the United States of America and potential claimants Pablo Salcedo Jr. and Karina Salcedo (“claimants”), by and through their respective counsel, as follows:

1 1. On or about September 16, 2020, claimants filed a claim in the administrative forfeiture
2 proceeding with the Federal Bureau of Investigation with respect to the Approximately \$42,687.68 seized
3 from Wells Fargo Bank Account Number 320-3742212, Approximately \$1,840.42 seized from Wells
4 Fargo Bank Account Number 517-7263489, Approximately \$629.84 seized from Wells Fargo Bank
5 Account Number 532-7107099, Approximately \$143.04 seized from Wells Fargo Bank Account Number
6 530-4807349, Approximately \$50.08 seized from Wells Fargo Bank Account Number 333-4403940, and
7 Approximately \$16,566.00 in U.S. Currency, (hereafter “defendant funds”), which were seized on or
8 about June 18, 2020.

9 2. The Federal Bureau of Investigation has sent the written notice of intent to forfeit required
10 by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a
11 claim to the defendant funds under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimants has
12 filed a claim to the defendant funds as required by law in the administrative forfeiture proceeding.

13 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
14 forfeiture against the defendant funds and/or to obtain an indictment alleging that the defendant funds are
15 subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture
16 proceeding, unless the court extends the deadline for good cause shown or by agreement of the parties.
17 That deadline is December 15, 2020.

18 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to
19 February 12, 2021, the time in which the United States is required to file a civil complaint for forfeiture
20 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to
21 forfeiture.

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1 5. Accordingly, the parties agree that the deadline by which the United States shall be
2 required to file a complaint for forfeiture against the defendant funds and/or to obtain an indictment
3 alleging that the defendant funds are subject to forfeiture shall be extended to February 12, 2021.

4 Dated: 12/10/2020

McGREGOR W. SCOTT
United States Attorney

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6 By: /s/ Kevin C. Khasigian
KEVIN C. KHASIGIAN
Assistant U.S. Attorney


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9 Dated: 12/10/2020

/s/ Melissa Dougherty
MELISSA DOUGHERTY
Attorney for potential claimants
Pablo Salcedo Jr. and Karina Salcedo
Villapudua & Somera, P.C.
2431 W. March Lane, Suite 220
Stockton, CA 95207

(Signature authorized by email)

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15 **IT IS SO ORDERED.**

16 Dated: December 14, 2020


WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE